

Applicant: LIPTON et al.  
Appl. No. 10/667,148

***Remarks***

Applicants thank the Examiner for his consideration of their application, as reflected by the aforementioned Restriction Requirement.

Upon entry of the foregoing amendments, Claims 1-74 are pending. In particular, new Claims 71-74 have been added. Support for these claims can be found, for example, in original Claims 1, 4, and 10 and in Applicants' specification, e.g., at page 6, paragraph 13.

Entry of this Amendment is respectfully requested.

As mentioned above, Applicants respectfully traverse the restriction requirement and request that it be reconsidered and withdrawn. Applicants' traversal is for at least the following reasons.

First, at page 2, the Restriction Requirement asserts that the claims of Group I are drawn to aligning images to one another and that the claims of Group II are drawn to image segmentation. However, review of the claims reveals that all claims, in both groups, are directed to implementing an intelligent video surveillance system. None of the claims are directed to either image alignment or to image segmentation, *per se*. That is, there are no subcombination claims, as asserted. Hence, Applicants respectfully submit that it is not proper to impose a restriction requirement on Groups I and II.

Second, Applicants note the addition of new Claims 71-74. Claims 71 and 72 are independent claims that discuss the building and updating of a statistical background model, the labeling of video regions based on the statistical background model, the identification and

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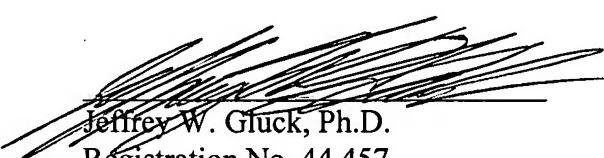
classification of objects in the video based on the labeling, and the analysis of behavior of the objects. Applicants respectfully submit that these claims are generic with respect to all of the other independent claims. Because such claims can be written (and are now included in this application), it is respectfully submitted that Groups I and II cannot be distinct from each other, as asserted. Applicants, therefore, respectfully request that the Restriction Requirement be withdrawn.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Election and Amendment is respectfully requested.

Respectfully submitted,

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